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JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176  
Jefferson City, MO 65102  
314-751-3241

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks and  
Historic Preservation

April 14, 1986

LOW #86-2.001

Tract I

Mr. J. C. Patterson  
Branch Manager  
~~McDonnell-Douglas Corp.~~  
P.O. Box 516 - Dept. 891C  
Bldg. 305, L-4W  
Hazelwood, MO 63166

Dear Mr. Patterson:

Enclosed please find a copy of the report prepared in response to an August 20, 1985, inspection of the Tract I and Tract II facilities of your Hazelwood complex for compliance with the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law.

At the time of inspection, six (6) violations were noted and are listed in the "Unsatisfactory Features" portion of the inspection report. The violations must be corrected, and documentation verifying compliance must be submitted to the Waste Management Program. This documentation should at least include:

- A. Copies of manifests or other documentation demonstrating the disposal or disposition of containers violating the maximum inventory condition (1.A.IV.d) of the Tract I permit;
- B. A description of steps taken to separate incompatible wastes at the Tract I site, in accordance with Special Condition 1.A.IV.c of the permit, and to prevent this violation in the future;
- C. Copies of manifests demonstrating proper disposal of all hazardous wastes stored in excess of the ninety (90) day limit at the Tract II facility, in violation of 10 CSR 25-7.050(2);
- D. A statement that all containers of hazardous waste will be kept closed during storage, in accordance with 10 CSR 25-7.050(3)(E)1;
- E. A statement that hazardous waste will be stored in containers in good condition, only, and an explanation of why inspection procedures did not prevent this violation of 10 CSR 25-7.050(3)(C); and
- F. A statement that containers of hazardous waste will be properly marked, in accordance with 10 CSR 25-7.050(2)(A)4.

RCRA RECORDS CENTER

R00144300



Mr. J. C. Patterson  
April 14, 1986  
Page Two

Additionally, please find enclosed the Hazardous Waste Transporter Facility Checklist prepared for the inspection of April 8, 1986. It contains one major unsatisfactory feature, a failure to have available for inspection all necessary manufacturer's certificates and reports, as required by 49 CFR 177.814 and 10 CSR 25-6.010(2)(A). In order for your corporation to be found in compliance, you must:

1. Submit a copy of the Manufacturer's Certificate for cargo-tank MC 312 SS.

All documentation submitted for compliance should be sent to Mr. Arthur H. Groner, Chief, Enforcement Unit, Waste Management Program, Missouri Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102, by May 14, 1986.

Please be aware that any future permit violations by McDonnell-Douglas Corporation may result in the assessment of penalties against the corporation.

I believe this Letter of Warning is self-explanatory, but please contact Mr. Tom Judge of this office if you have any questions.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

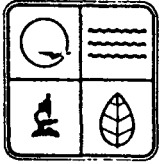


David E. Bedan, Ph.D.  
Director  
Waste Management Program

DEB/tjd

cc: Mr. R.H. Kaatman, McDonnell-Douglas Corporation  
Mr. Marc Rivas, U.S. EPA Region VII

bcc: SLRO  
WMP



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 176  
Jefferson City, MO 65102  
314-751-3241

HAZARDOUS WASTE TRANSPORTER FACILITY

Name of Transporter: McDonnell Douglas Corp. Date: 4-8-86  
Address: 140 McDonnell Blvd. MO Transporter License #: H-1039  
St Louis Missouri Expiration Date: 6-30-86  
Company Representative: Jim Gurler EPA I.D. #: MO000818963  
Title: Section Manager. HM Branch Telephone #: (314) 232 9327  
Is this a Generator? Yes If so, Generator I.D. #: Exh Point of Generation  
Is this a RR or TSD facility? Yes If so, ID/Permit #: Interim Status.

Records	As Required	Deficient	Remarks
Drivers Qualification Certificate	* <input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Four missing road test</u>
Drivers Written Exam Certificate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Drivers Medical Exam Certificate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>One missing physical exam</u>
Completed Manifests Retained for 3 years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Incident Reports Retained for 3 years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>None to date</u>
Vehicle Inspection Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Employee Training Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Accident Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>None to date</u>
Drivers Daily Log Retained for 6 months	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Exempt 100 mile radius.</u>
Cargo Tanks			
Visual and/or Hydrostatic tests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Manufacturer Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Required by 49CFR 177.814</u>

\* Also need copy of application  
for employment in driver's  
qualification file

Inspector's Signature: [Signature]  
Title: Environmental Specialist  
Office: E.O. WMP.

27.080

McDonnell Douglas - St. Louis

## RCRA COMPLIANCE INSPECTION REPORT

### FACILITY

McDonnell Douglas Corporation

P.O. Box 516, Dept. 891C

Building 305, L-4W

Hazelwood, Missouri 63166

314-232-3319

Mr. J. C. Patterson - Branch Manager, Environmental Compliance

Facility Permit #: 050 062284 002

Primary EPA ID#: Tract I - MOD000818963

Tract II - MOD000818906

Primary MDNR ID#: Tract I - 01001

Tract II - 01248

### INTRODUCTION

An inspection of the McDonnell Douglas Corporation (MDC) - Hazelwood complex was conducted on August 20, 1985 to assess compliance with Part B permit conditions and all applicable requirements pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law. Joe Haake, Environmental Specialist, represented the Missouri Department of Natural Resources - St. Louis Regional Office (MDNR-SLRO). Messrs. Robert Kaatman and Brian Kury of the Environmental Compliance Section represented MDC.

The MDC complex at Hazelwood encompasses corporate world headquarters and manufacturing sites for high technology aerospace products including military fighter aircraft, space systems, and missiles. A total of forty nine (49) separate hazardous waste streams have been identified and registered with MDNR - Waste Management Program (WMP) for all MDC operations within the St. Louis area.

The manufacturing sites at the Hazelwood complex are divided into two (2) tracts. Tract I is fully permitted as a TSD facility and utilizes a variety of tanks for storage and/or treatment of hazardous waste. Containerized hazardous waste is also stored at the Tract I facility. All forty nine (49) waste streams have been registered with respect to this site. The Tract II facility includes an area for the storage of containerized hazardous waste in conformance with "generator only" requirements of less than ninety (90) day storage.

The Tract I containerized storage area is also designated as the site which manages the drummed waste from each of the ten (10) off-site MDC satellite generators located in the metropolitan St. Louis area. These specific facilities, which have been assigned individual state and federal (if appropriate) generator identification numbers, are as follows:

1. Tract II, Hazelwood complex  
EPA ID: MOD000818906  
MDNR ID: 01248

2. Shipping and receiving/offices, Hazelwood complex  
EPA ID: MOD000818955  
MDNR ID: 01249
3. Oakland Avenue warehouse, City of St. Louis  
EPA ID: MOD000818930  
MDNR ID: 01250
4. Offices, Hazelwood complex  
EPA ID: MOD000818971  
MDNR ID: 01251
5. Goodfellow Avenue warehouse, City of St. Louis  
EPA ID: MOD000818922  
MDNR ID: 01252
6. St. Charles warehouse  
EPA ID: MOD000818948  
MDNR ID: 01253
7. Offices, Hazelwood complex  
EPA ID: MOD000818914  
MDNR ID: 01254
8. Earth City warehouse, St. Louis County  
EPA ID: MOD980633341  
MDNR ID: 03326
9. Olivette warehouse, St. Louis County  
No EPA ID  
MDNR ID: 03366
10. Frost Avenue warehouse, St. Louis County  
No EPA ID  
MDNR ID: 04217

Waste generated at the satellite waste generation points are transported to the Tract I area via licensed MDC vehicles. Required manifesting procedures are followed for such shipments.

Hazardous waste in storage at the Tract I facility is eventually hauled by licensed transporters to off-site disposal or resource recovery facilities. The contractors currently used by MDC are as follows:

1. ILWD in Indianapolis, Indiana.
2. LWD in Calvert City, Kentucky.
3. Peoria Disposal Company in Peoria, Illinois.
4. Midwest Oil Refining Company in St. Louis, Missouri.

5. Gateway Petroleum Company in East St. Louis, Missouri.
6. Mallinckrodt Company in St. Louis, Missouri.

No process changes have occurred since the issuance of the Part B permit. Reference should be made to the MDC permit application for a complete description of the permitted storage components and generated hazardous wastes.

#### UNSATISFACTORY FEATURES

1. The number of containers of hazardous waste in the Tract I storage area exceeded the maximum inventory set forth in the Hazardous Waste Facility Permit, Special Conditions 1.A.IV.d.
2. Containers of incompatible hazardous waste at the Tract I storage site were not maintained in separate areas as required by the Hazardous Waste Facility Permit, Special Conditions 1.A.IV.c.
3. Several containers of hazardous waste in storage at the Tract II facility had not been removed within the ninety (90) day time period as required by 10 CSR 25-7.050(2).
4. Two (2) containers of hazardous waste in storage at the Tract I facility were not closed as required by 10 CSR 25-7.050(3)(E)1.
5. One (1) container of hazardous waste in storage at the Tract I facility was not in good condition as required by 10 CSR 25-7.050(3)(C).
6. Several containers of hazardous waste in storage at the Tract II facility were not marked with accumulation start dates as required by 10 CSR 25-7.050 (2)(A)4.

#### COMMENTS

The inspection consisted of an initial meeting with representatives of the MDC environmental compliance staff followed by a review of the completed hazardous waste manifests. A physical inspection of the waste storage/treatment components on the plant premises and a review of the required records were then conducted.

A total of four hundred seventy nine (479) 55-gallon drums of hazardous waste were observed in the Tract I container storage area. The number of drums exceeded the maximum designated inventory of three hundred thirty six (336) 55-gallon drums. Delays in locating and contracting with reputable disposal facilities have resulted in this over-accumulation of drummed waste. Because of the amount of waste in storage, fifty six (56) 55-gallon drums of acid waste were stored along with oil and solvent waste, directly violating special incompatible waste requirements of the permit.

The Tract II storage area contained one hundred forty one (141) 55-gallon drums and various smaller containers of hazardous waste. Several containers had been stored over the maximum ninety (90) day time period. Also containers of lab-pack waste were not marked with accumulation start dates.

The cyanide and sulfide storage area at the Tract I facility contained thirty one (31) 55-gallon drums of waste. During periods of heavy rain, water leaks through the back wall of the storage area and collects in the spill containment sump. All collected water is immediately pumped out and managed as a hazardous waste.

All other storage components and required records were found to be in compliance with permit conditions and applicable state and federal regulations.

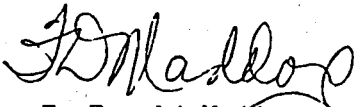
#### RECOMMENDATIONS

1. Maintain the inventory of containerized hazardous waste in the Tract I storage area at or below the maximum limit specified in the permit.
2. Store incompatible wastes in the separate designated sections of the Tract I storage area.
3. Remove hazardous waste in storage at the Tract II facility within the required ninety (90) day time period.
4. Keep all containers of hazardous waste closed while in storage.
5. Transfer the contents of leaking drums of hazardous waste in storage to containers in good condition.
6. Properly mark accumulation start dates on containers of lab-pack waste in storage at the Tract II facility.

Notice of Violation #0632 was issued due to the improper storage of incompatible waste and the failure to remove accumulated hazardous waste from the Tract II area within ninety (90) days.

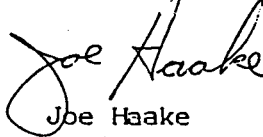
Should you have any questions concerning this inspection report, please contact the St. Louis Regional Office.

APPROVED BY:



F. Donald Maddox  
Regional Administrator  
St. Louis Regional Office

PREPARED BY:



Joe Haake  
Environmental Specialist  
St. Louis Regional Office

JH/FDM/dl

Enclosure

Waste Amount/month Kilogram/month I.D. Disposition

1. 49 SEPARATE WASTE STREAMS IDENTIFIED ON MDNR  
2. REGISTRATION FORMS AND MAINTAINED IN SLRO FILES.  
3. \_\_\_\_\_  
4. \_\_\_\_\_  
5. \_\_\_\_\_  
6. \_\_\_\_\_  
7. \_\_\_\_\_  
Total 3,194.7518 KKG

Subtract amount going to Resource Recovery or sewer ?

Amount subject to generator fee (KKG) ?  
(subject if over 2000 lbs. of waste is produced per year)

Is generator fee applicable to this facility? Yes ☒ No \_\_\_\_\_

If so, is the fee being paid? Yes ☒ No \_\_\_\_\_

#### MANIFESTS (10 CSR 25-5.010(4))

- ☒ 1. Generator's Missouri and EPA I.D. Number
- ☒ 2. Serially increasing shipment number
- ☒ 3. Generator's name, address, phone number, EPA I.D. number
- ☒ 4. All transporter's names, addresses, phone numbers, and EPA I.D. numbers  
Hazardous waste management facility name, address, phone number, and EPA I.D. number
- ☒ 6. Proper DOT shipping name and hazard class
- ☒ 7. Quantity, container type, and number of units being shipped
- ☒ 8. Emergency instruction and special handling procedures
- ☒ 9. Proper certification
- ☒ 10. Manifest properly signed and dated
- ☒ 11. Time between generator and facility signature less than 10 days
- ☒ 12. Copy to generator in 30 days
- ☒ 13. If not, exception generator report submitted within 45 days
- ☒ 14. Completed manifests submitted to Department quarterly
- ☒ 15. Copy at facility for three (3) years

#### Comments on manifests

#### CONTAINERIZATION AND LABELING

- ☒ 1. Waste properly containerized and labeled during storage if it is being transported off-site (5.010(6))
- ☒ 2. Are wastes stored at non-permitted locations marked with the date of accumulation (7.050(2)(A)4.)
- ☒ 3. Are wastes stored at non-permitted locations stored for less than 90 days (7.050(2)(A))

Inspector's Name: Joe Heaville

Title: ES II

Office: SLRO



HAZARDOUS WASTE PERMITTED TSD FACILITY  
GENERATOR CHECKLIST

Date 8-20-85

Name of Facility: MCDONNELL DOUGLAS CORP.

MO Permit # 050062284002

Address: P.O. Box 516

MO I.D. # 01001

ST. LOUIS, MISSOURI 63166

EPA I.D. # MO0000818963

Contact: M.R. J.C. PATTERSON

Phone No.: 314-232-3319

Transporter? YES, # H1039, Resource Recovery? NO, # —

Provide a brief description of the manufacturing process: MANUFACTURING  
OF HIGH TECHNOLOGY AEROSPACE PRODUCTS INCLUDING MILITARY FIGHTER  
AIRCRAFT, SPACE SYSTEMS, AND MISSILES. PROCESSES INVOLVE  
METAL CUTTING, MILLING, FORMING, GRINDING, AND ELECTROPLATING;  
DEGREASING; PAINTING; CHEMICAL PROCESSING IN TANKS; AND  
AIRCRAFT FUELING OPERATIONS.

Describe any new processes added since permit issuance: NONE

Any new waste streams? NO

General comments and observations: \_\_\_\_\_

- ☒ 4. Records and results of monitoring, testing, and analysis performed (8.011(6)(B)2.E. and M.)
- ☒ 5. Summary reports on incidents requiring implementation of contingency plan (7.011(6)(B)2.F.)
- ☒ 6. Records of inspections (7.011(6)(B)2.G.)
- ☒ 7. Waste analysis records from off-site sources and notices of acceptance to generators (7.011(6)(B)2.I.)
- ☒ 8. All closure and post closure cost estimates (7.011(6)(B)2.J.)
- ☒ 9. A complete copy of the permit application (7.011(6)(B)2.K.)
- ☒ 10. Personnel training documentation (7.011(6)(B)2.L. and M.)
- ☒ 11. Record documenting refusal of arrangements from local emergency response authorities (7.011(6)(B)2.N.)

#### Reporting

- ☒ 1. Monthly Facility Reports available and submitted (7.011(6)(C)1.A.)
- ☒ 2. Are wastes received and not manifested reported within fifteen (15) days (7.011(6)(C)1.D.)

#### Financial

- ☒ 1. Has the closure cost estimate been adjusted annually (7.011(8)(B)1.)
- ☒ 2. Is the closure cost estimate kept at the site (7.011(8)(B)4.)

#### Containers

- ☒ 1. Are ignitable or reactive waste located at least fifty feet (50') from the property line (7.050(3)(A)1.)
- ☒ 2. Containers in good condition (7.050(3)(C))
- ☒ 3. Containers closed during storage (7.050(3)(E)1.)
- ☒ 4. Has the facility conducted and recorded the results from weekly inspections (7.050(3)(E))
- ☒ 5. Is the containment system free from cracks or gaps (7.050(3)(G)2.A.)
- ☒ 6. Is the present storage inventory in accordance with the permitted limits (permit condition)
- ☒ 7. Are any hazardous wastes stored outside the storage area (if no check, if yes blacken, these wastes must comply with 7.050(2)(A))
- ☒ 8. *INCOMPATIBLE WASTES SEPARATED (PERMIT CONDITION)*

#### Tanks

- ☒ 1. If ignitable or reactive wastes are stored are they protected from any material or condition which may cause the waste to ignite or react (7.050(4)(A)1.B.)
- ☒ 2. Does the leak detection system indicate leakage (if no check, if yes blacken)
- ☒ 3. Do uncovered tanks have sufficient freeboard (7.050(4)(D)2.B.)
- ☒ 4. Are tanks with overfilling control equipment tested once a day (7.050(4)(E)1.A.)
- ☒ 5. Is data from monitoring equipment recorded once each operating day (7.050(4)(E)1.B.)
- ☒ 6. For uncovered tanks is the freeboard checked at least once a day (7.050(4)(E)1.C.)
- ☒ 7. Are the construction materials inspected weekly to detect corrosion, erosion and leaking fixtures or seams (7.050(4)(E)1.D.)
- ☒ 8. Is the area immediately surrounding the tank inspected weekly to detect signs of leakage (7.050(4)(E)1.E.)

#### Surface Impoundments

- ☒ 1. Are inspections conducted weekly and after storms (7.060(3)(B))
- ☒ 2. Are overtopping control systems functioning properly (7.060(2)(B))
- ☒ 3. Has there ever been a sudden drop in the level of the impoundment (7.060(3)(B)2.)
- ☒ 4. Have liquids been collected in the leachate collection and removal system (7.060(3)(B)3.)
- ☒ 5. Is there any erosion or other signs of deterioration (7.060(3)(B)4.)
- ☒ 6. Do the surface impoundments have adequate freeboard as described in the permit (7.060(2)(B))

#### Groundwater Monitoring and Post-Closure Permits

- ☒ 1. Wells in good condition, properly covered and locked
- ☒ 2. Wells properly sealed to prevent surface infiltration
- ☒ 3. Test pumps for faucets if present
- ☒ 4. Conduct cursory review of monitoring results and record last sampling date and last date results were submitted to the WMP/PS
- ☒ 5. Are the Quality control/Quality Assurance Plans kept on-site

Please mark boxes as shown below

☒ IN COMPLIANCE OR IN GOOD CONDITION

☐ IN VIOLATION OR IN POOR CONDITION (Must be described in the report.)

Inspector's Name: Joe Hoake

Title: ES II

Office: SLRO

# GENERAL INSPECTION CHECKLIST

## Waste Analysis Plan

- ☒ 1. Have the manufacturing processes at the facility changed since the permit was issued (yes, blacken box)
- ☒ 2. Is procedure to confirm wastes received from off-site being followed (7.011(3)(C)3.)

## Security (7.011(3)(D))

- ☒ 1. Twenty-four hour surveillance or provision 2 and 3
- ☒ 2. An artificial or natural barrier in good condition and provision 3
- ☒ 3. Restricted access at each entrance
- ☒ 4. Warning signs legible from 50' on all approaches

## General Inspection

- ☒ Conduct an inspection using the facilities checklist
- ☒ 1. Does facility inspection schedule identify problems which could be expected (no, blacken box)
- ☒ 2. Does the schedule inspect the following: (7.011(3)(E)2.)
  - ☒ a. monitoring equipment
  - ☒ b. safety and emergency equipment
  - ☒ c. security devices
  - ☒ d. operating and structural devices
- ☒ 3. Are inspections being conducted regularly and at the proper frequency (7.011(3)(E)1.)

## Personnel Training (7.011(3)(F))

- ☒ 1. Have employees completed classroom or on-the-job training
- ☒ 2. Job title description and name of person filling position regularly updated
- ☒ 3. Written record of the type and amount of training given to each person
- ☒ 4. Documentation confirming that training has been given
- ☒ 5. Is there continuing training given (yearly update)
- ☒ 6. Are new employees trained within 6 months

## Preadaredness and Prevention (7.011(4))

- ☒ 1. Internal communications or alarm system in operation
- ☒ 2. A device in the hazardous waste operation area cable of summoning emergency assistance
- ☒ 3. Portable fire extinguishers and fire control equipment
- ☒ 4. Spill control equipment and decontamination equipment
- ☒ 5. Adequate water supply
- ☒ 6. Safety Equipment (fire blankets, gas masks, eye wash)
- ☒ 7. Access to communications or alarm when waste is being handled
- ☒ 8. Adequate aisle space at drum storage area
- ☒ 9. Arrangements with local authorities updated (ie: when a new emergency coordinator is assigned is a new copy sent to local emergency authorities)

## Contingency Plan and Emergency Procedures

- ☒ 1. Contingency plan easily accessible
- ☒ 2. List of emergency coordinators up-to-date (7.011(5)(E)4.)
- ☒ 3. List of all emergency equipment up-to-date (7.011(5)(E)5.)
- ☒ 4. Check location of emergency equipment for several items on the above list (If cannot be located, blacken box)
- ☒ 5. Evacuation plan easily accessible or displayed
- ☒ 6. Has the contingency plan ever been implemented (no check box, yes blacken box)

## Manifests

### For off-site facilities

- ☒ 1. Manifests signed and dated (7.011(6)(A)1.)
- ☒ 2. Copy to transporter (7.011(6)(A)1.)
- ☒ 3. Copy to generator in 15 days (7.011(6)(A)1.)
- ☒ 4. Copy at facility for 3 years (7.011(6)(A)1.C.)
- ☒ 5. Are manifests in good systematic order
- ☒ 6. Are manifest discrepancies reported properly (7.011(6)(A)1.A. and B.)

## Recordkeeping

- ☒ 1. Operating record available (7.011(6)(B)1.)
- ☒ 2. Operating record must include the following: (7.011(6)(B)2.)
  - ☒ a. information from each manifest
  - ☒ b. method of treatment, storage, or disposal for each hazardous waste and the date accomplished
  - ☒ c. location and quantity of each waste at the facility (verify several by field check)
  - ☒ d. a description of each waste
  - ☒ e. a description of the process that produced each waste
  - ☒ f. applicable hazardous waste numbers
  - ☒ g. weight or volume-density with units
  - ☒ h. methods, locations, and dates with reference to manifest numbers and/or chain of custody
- ☒ 3. Volumes, dates removed, and disposition of leachate (7.011(6)(D)2.D.)

D. PERSONNEL TRAINING 10 CSR 25-7.050 cross-referenced to  
10 CSR 25-7.011(J)(F)

Waste Contained

Volume of Tank

23. Completed classroom or on-the-job training ..... ☒
24. Job title, description, and name of person filling position ..... ☒
25. Written record of the type and amount of training given ..... ☒
26. Documentation confirming that training has been given .... ☒
- E. PREPAREDNESS AND PREVENTION 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(4)
27. Internal communication or alarm system ..... ☒
28. Device in the hazardous waste operation area capable of summoning emergency assistance ..... ☒
29. Fire control, spill control, and decontamination equipment available ..... ☒
30. Adequate water supply for fire control equipment ..... ☒
31. Adequate and proper safety equipment available ..... ☒
32. Adequate aisle space ..... ☒
33. Arrangements with local emergency agencies ..... ☒
- F. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(5)
34. Contingency Plan ..... ☒
35. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste ..... ☒
36. Describe formal arrangements with emergency agencies ..... ☒
37. Names, addresses, and phone numbers (home & office) of emergency coordinators ..... ☒
38. Emergency equipment including its description and location ..... ☒
39. Evacuation plan if applicable ..... ☒

Comment: \_\_\_\_\_

40. Containers in good condition ..... ☒
41. Containers storing incompatible wastes or products are separated or protected from each other ..... ☒
42. Containers kept closed in storage ..... ☒
43. Containers stored within a waste confinement structure (if applicable) that meets the criteria of 10 CSR 25-7.050(3)(F) ..... ☒
44. Containers of ignitable or reactive waste are stored at least 50 feet from the property line ..... ☒

Comment: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

45. Tanks in good condition..... ☐
46. Procedure for inspecting tanks..... ☐
47. Above ground tanks - adequate spill confinement structures..... ☐
48. Underground tanks that cannot be entered have adequate leak detection systems..... ☐
49. Leak detection procedure and schedule developed and used..... ☐
50. Open tanks have \_\_\_\_ ft. freeboard..... ☐
51. Incompatible wastes in tanks safely and properly stored..... ☐
52. Volatiles are not placed in open tanks..... ☐
53. Ignitable or reactive wastes in tanks safely and properly stored..... ☐
54. Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements..... ☐
55. Controls to prevent overfilling..... ☐
56. Daily inspection of overfilling control equipment..... ☐
57. Daily inspection of freeboard in uncovered tanks..... ☐

**Comments:**

[illegible]

Office

☒ in compliance

**In violation**

## HAZARDOUS WASTE GENERATOR CHECKLIST

Name of Facility: McDONNELL DOUGLAS CORP. - TRACT IIDate: 8-30-85Address: P.O. Box 516ST. LOUIS, MISSOURI 63166Missouri I.D. # 01248Facility Representative: MR. J.C. PATTERSONEPA I.D. # MO0000818906Title: BRANCH MANAGER, ENV. COMPLIANCEPhone Number 314-232-3319Is this facility a TSD? NOTransporter? NO

Provide a brief description of the manufacturing process.

MANUFACTURING OF HIGH TECHNOLOGY AEROSPACE PRODUCTS INCLUDING MILITARY  
FIGHTER AIRCRAFT, SPACE SYSTEMS, AND MISSILES. PROCESSES INVOLVE METAL  
CUTTING, MILLING, FORMING, GRINDING, AND ELECTROPLATING; DEGREASING;  
PAINTING; CHEMICAL PROCESSING.

List the hazardous wastes produced:

Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1. <u>HUG-1-A REGISTRATION DATA MAINTAINED IN EX-RO FILES.</u>				
2. _____				
3. _____				
4. _____				
5. _____				
6. _____				
Total				

Subtract amount going to Resource Recovery or sewer ?Amount subject to generator fee ?(Fee is applicable if this value is over 10 kkg annually.  
Fee based on generation from July 1 through June 30)Is generator fee applicable to this facility? Yes ☒ No ☐ (If yes, is it being paid? Yes ☒ No ☐)Is the head tax applicable to this facility? Yes ☐ No ☐ (If yes, is it being paid? Yes ☐ No ☐  
(Quarterly ☐ Annually ☐)Is the land disposal fee applicable to this facility? Yes ☐ No ☐ (If yes, is it being paid? Yes ☐ No ☐)If the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes ☒ No ☐If the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes ☒ No ☐If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes ☒ No ☐Has the generator determined if waste is hazardous? Yes ☒ No ☐

## A. MANIFESTS 10 CSR 25-5.010(4)

- Generator's Missouri and EPA I.D. Numbers ☒
- Serially increasing shipment number ☒
- No. waste I.D. # correct ☒
- Generator's name, address, phone number, EPA I.D. number ☒
- All transporters' names, addresses, phone numbers, and EPA I.D. numbers ☒
- Hazardous waste management facility name, address, phone number, and EPA I.D. number ☒
- Proper DOT shipping name and hazard class ☒
- Quantity, container type, and number of units being shipped ☒
- Emergency instructions and special handling procedures ☒
- Proper certification ☒
- Manifest properly signed and dated ☒
- Time between generator and facility signature no more than ☒

- Manifests returned within 30 days ☒
- If not, exception generator report submitted within 45 days ☒
- Completed manifests submitted to Department quarterly ☒

## B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

- Waste stored in proper DOT containers ☒
- Containers labeled "Hazardous Waste" and labeled per proper DOT requirements during storage ☒

## C. STORAGE STANDARDS 10 CSR 25-7.050

- Facility inspected and maintained ☒
- Ignitable and reactive wastes properly handled ☒
- Date of accumulation marked ☒
- Storage less than 90 days (if applicable) ☒
- Waste oil properly handled ☒

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NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS  
OF THE MISSOURI HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS

TO: Facility Name: McDONNELL DOUGLAS CORPORATION - ST. LOUIS  
Address: PO BOX 516 DEPT 991C BUILDING 305 L-4W  
ST. LOUIS MO 63166  
Mo. ID#: 01001 01348 Date of Inspection: 8-20-85

During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Sections 260.350 - 260.550 RSMo., and/or the Rules and Regulations, 10 CSR 25 the following violations were identified.

Citation	Description of Violation
<u>HAZARDOUS WASTE</u>	<u>CONTAINERS OF INCOMPATIBLE HAZARDOUS</u>
<u>PERMIT</u>	<u>WASTE IN STORAGE NOT SEPARATE</u>
<u>260.102(2)(2)</u>	
<u>10 CSR 25-7.050(2)</u>	
<u>1 A.W.C.</u>	
<u>10 CSR 25-7.050(2)</u>	<u>FAILURE TO REMOVE HAZARDOUS WASTE IN</u>
	<u>LESS THAN NINETY 90 DAYS FROM TRACT II</u>
	<u>AREA</u>

This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo. and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement and Superfund Section, Waste Management Program, P. O. Box 1368, Jefferson City, MO 65102 with a copy to the Administrator, ST. LOUIS Regional Office.

The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call

JOE CRONER at 314-751-3241 or JOE HENKE  
at 314-249-1313

Signature of Preparer [Signature] Date 8-20-85

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Robert KASTMAN Date 22 AUG 85

Signature: [Signature]

Title: Asst. Mgr.

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